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By CM/ECF

Hon. Lorna G. Schofield United States District Court Southern District of New York 40 Foley Square New York, NY 10007

January 31, 2025
Application Granted. The sentencing hearing currently scheduled for March 17, 2025, is adjourned to **April 28, 2025**, at 11:00 a.m. Defendant's sentencing submission shall be filed by **April 7, 2025**. The Government's sentencing submission shall be filed by **April 10, 2025**. The Clerk of the Court is directed to terminate the letter motion at docket number 44. Dated: February 3, 2025
New York, New York

Re: United States v. Dannon Crawford 23 Cr. 566 (LGS)

United States District Judge

Dear Judge Schofield:

I write with the consent of the Government to respectfully request that the Court adjourn Dannon Crawford's March 17, 2025, sentencing proceeding by 30 days.

On January 13, 2025, United States Probation published its initial Pre-Sentence Report. On Wednesday, January 29, 2025, I sent the Government and Probation a substantial written objection to the guidelines calculation set forth in the initial PSR. In the letter, I argued against application of the attempted murder cross reference under <u>U.S.S.G. § 2A2.1</u>, and instead urged Probation to either apply the aggravated assault guidelines under Section 2A2.2 or the standard firearms guidelines under Section 2K2.2.

Given this development, an adjournment of sentencing and the parties' respective submission deadlines is appropriate. Additional time is necessary to give Probation and the Government an opportunity to review my thorough letter and reconsider the appropriate guidelines range, possibly obviating the need for the Court to resolve any disputes concerning the guidelines at sentencing. I have conferred with AUSA Justin Horton, who does not object to the adjournment.

Pertinent to this motion, Mr. Crawford remains employed and in full compliance with his bail conditions. I thank the Court for its consideration of this application.

Cc: AUSA Justin Horton

Andrew John Dalack, Esq.

Respectfully Submitted

Assistant Federal Defender